

# **Exhibit A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD) (SN)  
ECF Case

*This document relates to:*  
*ALL CASES*

**PLAINTIFFS' FIRST SET OF SUPPLEMENTAL CONSOLIDATED  
JURISDICTIONAL REQUESTS FOR PRODUCTION OF  
DOCUMENTS DIRECTED TO THE KINGDOM OF SAUDI ARABIA**

These requests incorporate, as is fully set forth herein, the introduction, instructions and definitions set forth in Plaintiffs' First Set of Consolidated Jurisdictional Requests for Production served on April 26, 2008. Unless the nature or subject matter of the request indicates otherwise, or a different time period is specified, the relevant time period for these requests is from January 1, 1998 through and including September 11, 2001.

**DOCUMENT REQUESTS**

1. For each of the following persons:
  - i. Abdullah Ali Saleh al Jaithen aka Abdullah AS al Jraithen;
  - ii. Musaed Ahmed al Jarrah;
  - iii. Smail Mana aka Ismail Mana;
  - iv. Mohamed Sulaiman al Muhanna;
  - v. Adel Mohamed al Sadhan;
  - vi. Mutaeb Abdelaziz al Sudairy; and
  - vii. Sharif Al-Batikhi;

provide documents concerning:

- (a) his hiring by the Saudi government and job title(s), duties, responsibilities, functions, authorities, and any secondments;

- (b) his payments from the Saudi government and the justification for such payments;
- (c) the records of his diplomatic status and or/credentials in the United States;
- (d) each location, including but not limited to a home, apartment, hotel and rooming house, within the State of California where he resided or stayed during the period from January 1, 1999 through and including September 11, 2001;
- (e) his assignment to, tasks, and activities within the State of California;
- (f) his passport and visa records;
- (g) the name(s), job titles, and responsibilities of his supervisors and/or any persons to whom he reported in relation to his work;
- (h) the name(s), job titles, and responsibilities of the persons that he supervised and/or any persons who reported to him in relation to their work;
- (i) his travel from January 1, 1999 through September 11, 2001, including but not limited to flights, hotels, car rentals and travel expenses, and the purpose of said travel;
- (j) any meeting, communication, contact, transaction, or relationship that he had with (1) Omar al Bayoumi; (2) Fahad al Thumairy; (3) Khalid al Sowailam; (4) the King Fahad Mosque and/or The Islamic Foundation of Sheikh Ibn Taymiyah, including but not limited to any officer or employee of the King Fahad Mosque and/or The Islamic Foundation of Sheikh Ibn Taymiyah; (5) Abdussattar Shaikh; (6) Caysan Bin Don aka Isamu Dyson; or (7) any of the 9/11 Hijackers.

Dated: October 10, 2018

Respectfully,

KREINDLER & KREINDLER LLP

MOTLEY RICE LLC

By: /s/ James P. Kreindler  
JAMES P. KREINDLER  
For the Plaintiffs Exec. Committees

By: /s/ Robert T. Haefele  
ROBERT T. HAEFELE  
For the Plaintiffs Exec. Committees

COZEN O'CONNOR

ANDERSON KILL P.C.

By: /s/ Sean P. Carter  
SEAN P. CARTER  
For the Plaintiffs Exec. Committees

By: /s/ Jerry S. Goldman  
JERRY S. GOLDMAN  
For the Plaintiffs' Exec. Committees

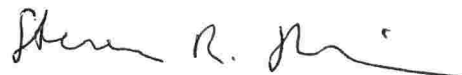
**CERTIFICATE OF SERVICE**

I hereby certify that on this 10th day of October, 2018, I caused a copy of the foregoing PLAINTIFFS' FIRST SET OF SUPPLEMENTAL CONSOLIDATED JURISDICTIONAL REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO THE KINGDOM OF SAUDI ARABIA to be served by email and First Class Mail upon the following for their further distribution to counsel for all parties in this action:

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- and -

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*(Defendants' Executive Committee's appointed representative  
to receive discovery requests and responses in MDL 1570)*



Steven R. Pounian